

INTERVENTION

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BEFORE THE ARIZONA CORPORATION COMMISSION

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CHAIRMAN

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COMMISSIONER

SANDRA KENNEDY
COMMISSIONER

JUSTIN OLSON
COMMISSIONER

LEA MÁRQUEZ PETERSON
COMMISSIONER

IN THE MATTER OF THE)	DOCKET NO. E-01345A-19-0236
APPLICATION OF ARIZONA PUBLIC)	
SERVICE COMPANY FOR A)	
HEARING TO DETERMINE THE)	
FAIR VALUE OF THE UTILITY)	
PROPERTY OF THE COMPANY FOR)	
RATEMAKING PURPOSES, TO FIX A)	SOLAR ENERGY INDUSTRIES
JUST AND REASONABLE RATE OF)	ASSOCIATION'S AND ARIZONA
RETURN THEREON, TO APPROVE)	SOLAR ENERGY INDUSTRIES
RATE SCHEDULES DESIGNED TO)	ASSOCIATION'S APPLICATION FOR
DEVELOP SUCH RETURN.)	LEAVE TO INTERVENE

Pursuant to A.A.C. R14-3-105, the Solar Energy Industries Association ("SEIA") and its local Arizona chapter, the Arizona Solar Energy Industries Association ("AriSEIA"), hereby make their Application for Leave to Intervene (the "Application") in the above captioned matter (the "Matter"). SEIA is a non-profit trade association made up of local, national, and international solar and energy storage companies from all industry sectors and AriSEIA is a non-profit trade organization made of solar and energy storage companies and individuals with interests in the Arizona solar and energy storage industry.

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1 In support of this Application, SEIA and AriSEIA state as follows:

2 **I. SEIA and AriSEIA are Directly and Substantially Affected**

3 The proposals at issue in the Matter directly and substantially impact residential and
4 commercial consumer electric bills and related policies which directly and substantially affect the
5 economic viability of solar and energy storage in APS' service territory. SEIA and AriSEIA's
6 members have an interest in APS' rates and charges and the policies related to rate design
7 impacting the value of solar and energy storage to the consumer and to all ratepayers. Thus, SEIA
8 and AriSEIA will be directly and substantially affected by the Matter.

9 **II. SEIA and AriSEIA's Intervention Will Not Unduly Broaden These**
10 **Proceedings**

11 Granting SEIA and AriSEIA intervenor status will not unduly broaden the issues or
12 prejudice other parties to the Docket.

13 **III. SEIA and AriSEIA's Interests are Unique and no Other Party can Adequately**
14 **Represent their Interests**

15 SEIA and AriSEIA's interests cannot be adequately represented by any other party.
16 Resolution of the many issues impacted by the utility's proposal, which include, but are in no way
17 limited to, the utility's rate base, residential rate design, commercial rate design, energy storage,
18 demand-side resources in general, residential distributed solar, non-residential distributed solar,
19 utility scale generation including traditional and renewable generation, the treatment of adjuster
20 mechanisms, cost of service, the value of distributed solar, and more, will each directly and
21 substantially affect customers' adoption of solar and energy storage products in APS service
22 territory. Therefore, SEIA and AriSEIA request that intervenor status be granted.

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1 All communications regarding this matter should be addressed to:

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8 **RESPECTFULLY SUBMITTED** this 18th day of December, 2019.

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10 **ROSE LAW GROUP pc**

11 /s/ Court S. Rich
12 Court S. Rich
13 Attorney for Solar Energy Industries Association
14 and Arizona Solar Energy Industries Association
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1 **Original e-filed on**
2 **this 18th day of December, 2019 with:**

3 Docket Control
4 Arizona Corporation Commission
5 1200 W. Washington Street
6 Phoenix, Arizona 85007

7 *I hereby certify that I have this day served a copy of the foregoing document on all parties of*
8 *record in this proceeding by regular or electronic mail to:*

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